

# **TECHNICAL REVIEW DOCUMENT FOR RENEWAL OF OPERATING PERMIT 95OPDE077**

to be issued to:

Shafer Commercial Seating, Inc.  
Denver County  
Source ID 0310910

Prepared by Cathy Rhodes  
November, 2002

## **1. Purpose**

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered by the renewal Operating Permit proposed for this site. The original operating permit was issued September 1, 1998 and expires on September 1, 2003. This document is designed for reference during review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted August 5, 2002. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

## **2. Source Description**

This source is primarily classified as a commercial wood furniture manufacturing facility under Standard Industrial Classification 2599. Ten percent (10%) of Shafer's overall manufacturing is done on site. The remaining 90% is imported from outside of the country. Their mill operation consists of various saws, sanders, etc. The finishing process requires five (5) paint spray booths for different steps in the process.

The Denver metropolitan is classified as attainment/maintenance for carbon monoxide, ozone and PM-10 (particulate matter less than 10 microns in size). Facility emissions from regulated equipment are as follows:

<u><b>Pollutant</b></u>	<u><b>Potential to Emit (tpy)</b></u>	<u><b>Actual (tpy)</b></u>
VOC	90.0	15.4
HAPs	90.0	4.1

Potential to Emit is based on the maximum allowable emissions as defined by the operating permit. Actual emissions are based on the VOC and HAP levels reported in the most recent APEN submittal.

This facility is not subject to the requirements of Section 112(r) of the Clean Air Act Amendments of 1990 based upon the Potential material usage as reported in the Title V application.

### **3. Discussion of Modifications Made**

#### *Source Requested Modifications*

The source requested the following changes to the permit in their renewal application:

#### **Page following Cover Page**

Change title of Responsible Official to “President.”

#### **Appendix A**

Add Safety Equipment requirements.

#### *Other Modifications*

In addition to the requested changes, the Division has included changes to make the permit consistent with recently issued permits, to include comments made by the EPA on other Operating Permits, to reflect updated and current Regulatory language, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the Shafer Operating Permit:

#### **Page following Cover Page**

The citation (above “issued to” and “plant site location”) provided the incorrect title for the state act. The title is changed from “Colorado Air Quality Control Act” to “Colorado Air Pollution Prevention and Control Act.” In addition, the date references are removed.

The dates for monitoring and compliance periods are clarified, i.e. changed from “December – May” to “December 1 – May 31.” Monitoring and compliance periods and report and certification due dates are shown as examples. The appropriate monitoring and compliance periods and report and certification due dates will be filled in after permit issuance and will be based on permit issuance date. Note that the source may request to keep the same monitoring and compliance periods and report and certification due dates as were provided in the original permit. Nevertheless, it should be noted that with this option, depending on the permit issuance date, the first monitoring period and compliance period may be short (i.e., less than 6 months and less than 1 year).

A Note regarding when reports will be considered to have met the date due deadline is added.

## **Section I**

Condition 1.1 is revised to reflect the new attainment status for the area.

Condition 1.3 is revised to reflect the Division's current policy regarding changes made to Construction Permits through the Operating Permit process.

Original Condition 1.4 is split into two new conditions (1.4 and 1.5), and Section IV condition citations are revised to reflect new Section IV condition numbers.

Condition 3 is added to reflect the PSD status of the source. Subsequent conditions in Section 1 are renumbered.

Condition 4 is revised based on comments by the EPA on other operating permits, the phrase "Based on information provided by the applicant" is added to the beginning of Condition 3.

Condition 5 is added for compliance assurance monitoring provisions. No emission points at this facility use a control device to achieve compliance with an emission limitation or standard.

## **Section II**

Language is added to all relevant conditions requiring records to be maintained for Division inspection upon request.

Condition 1.1 – Based on EPA comments on other Operating Permits, the word "show" (compliance) is replaced with "monitor."

Condition 1.5 – Language is revised to reflect current Regulation No. 1 opacity language. Regulation No. 1 30% opacity language is added. In addition, monitoring language is revised to indicate that, absent credible evidence to the contrary, compliance with the emission limits is assumed when the filters are changed in accordance with manufacturer's recommendations. The word "credible" as it is used in the term "credible evidence" shall be applied under the provisions of the permit as defined by Colorado and Federal Rules of Evidence.

Condition 1.3.2 is revised to indicate the WPIP has been developed in accordance with 63.803(a).

## **Section III – Permit Shield**

The Title for Condition 1 is changed from "Specific Conditions" to "Specific Non-Applicable Requirements."

Based on comments made by the EPA on another permit, the following statements were added after the introductory sentence in Condition 1. "This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance. In

addition, this shield does not protect the source from any violations that occur as a result of any modification or reconstruction on which construction commenced prior to permit issuance.”

Based on comments made by the EPA on another permit, the following phrase is added to the beginning of the Condition 1 introductory sentence. “Based upon the information available to the Division and supplied by the applicant...”

#### **Section IV – General Conditions**

Add Common Provisions requirements as Condition 3. (All subsequent conditions are renumbered)

Insert “and” between the Regulation No. 2 and the C.R.S. citations in Condition 4.

Update Fee Regulation Cites for Condition 8. In addition, references to specific identification of a fee (i.e., \$100 APEN fee) or citation of Regulation No. 3 is removed and replaced with more general language, since the specific fee amounts may change.

Update Odor Regulation Cite for Condition 14.

Update the Open Burning Regulation cite for Condition 17.

Condition 21 citation of the next general condition is revised to reflect new general condition numbers. (changed from “21.d” to “22.d”)

#### **Appendices**

First Page of Appendices – The titles of Appendices B and C are revised. The phrase “except as otherwise provided in the permit” is added after the word “enforceable” in the disclaimer at the request of the EPA.

Appendices B and C are replaced with the Division’s current reporting formats.

The EPA addresses in Appendix D are updated.

NOTE: The renewal application includes a Construction Permit for a wood fired furnace. This furnace is no longer used, is disconnected, and the Construction Permit has been cancelled for some time.